## Exhibit A



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TRACY CAEKAERT, and CAMMILLIA MAPLEY, Plaintiffs,

V.

BLG-SPW
WATCHTOWER BIBLE AND TRACT SOCIETY
OF NEW YORK, INC., WATCH TOWER
BIBLE AND TRACT SOCIETY OF
PENNSYLVANIA, and BRUCE MAPLEY SR.,
Defendants.

WATCHTOWER BIBLE AND TRACT SOCIETY
OF NEW YORK, INC.
Cross-Claimant,
v.

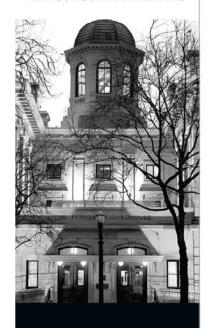
BRUCE MAPLEY SR., Cross-Claim Defendant.

ROUGH DRAFT VIDEOTAPED REMOTE DEPOSITION CAMILLIA MAPLEY

TAKEN ON WEDNESDAY, NOVEMBER 30, 2022 (TUESDAY, NOVEMBER 29, 2022)
5:12 A.M. AEDT (11:12 A.M. MST)

Cause No. CV-20-52-

WORKSPACE - LEVEL 5 171 COLLINS STREET MELBOURNE, 3000 AU







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Q. Can you tell me why? 1 2 Α. No, I don't know. 3 Q. And you don't --That's for -- I'm not the legal team. 4 Α. Why did you sue Bruce Senior in the first 5 Q. 6 place? 7 MR. SHAFFER: Object to form. Cami hired 8 lawyers to take wha thappened to her, what she recited happened to her and put that inbto legal 10 papers and filed them on her behalf, so if you're asking her for the strategic reasoning behind her 11 12 lawyers' decisions, I think that's an improper 13 question. 14 MR. SWEENEY: I think your comments are 15 improper, Ryan. My question is direct. She sued 16 Bruce Mapley Senior. I'm asking her why. 17 MR. SHAFFER: Same objection. BY MR. SWEENEY: 18 19 You can answer, Cami. Q. 20 Α. Because he sexually abused me. 21 Then why have you now dismissed your Q. 22 claims against Bruce Senior? 23 MR. SHAFFER: Same objection. 24 BY MR. SWEENEY: 25 And my answer is, is that's the lawyers' Α.

25

Α.

No.

MR. SWEENEY: Well, Ryan, this is not your lawsuit. This is hers. She sued Bruce. She dismissed Bruce. I'm going to ask her why.

If the answer is she doesn't know, she can

25 behind attorney/client privilege for why she named

tell me that, but I don't think she gets to hide

22

23

24

somebody as a defendant or why she dismissed them. 1 2 MR. SHAFFER: Her testimony has been 3 She left that to her lawyers to decide. lawyers decided it. You're asking her now to get 5 into what her lawyers told her as about why her lawyers dismissed Bruce Mapley, I believe that's 7 getting into attorney/client privilege communication. I'm not going to let her answer it. BY MR. SWEENEY: 10 Q. Cami, do you think Bruce Senior should still be a defendant in this lawsuit? 11 12 Well, his name's still on it, so isn't he? Α. 13 He has been dismissed by order of court, Q. 14 so inaccurately his name was represented as being in 15 the caption, but the claims have been dismissed, to clear that up for you. 16 17 Α. Well, I think the truth should come out, 18 and that's what our goal is here, isn't it? 19 And I appreciate that, but my question is: 20 Do you think Bruce Senior should still be a 21 defendant in this lawsuit? Don't know. 22 Α. 23 Q. How did you know Gunner Haines? 24 He was in the congregation. Α.



When did Gunner pass away?

25

Q.